SEP 16 1999 910

SIERRA CLUB, SAN DIEGO CHAPTER
San Diego and Imperial Counties
3820 Ray Street
San Diego, CA 92104-3623

Office (619) 299-1743
Conservation (619) 299-1741
Fax (619) 299-1742
Voice Mail (619) 299-1744
EBBS (619) 299-4018

September 13, 1999

Mr. Rick Breintenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Subject: Comments on CALFED Draft EIS/EIR

Dear Mr. Breintenbach:

Since the CALFED program is conducted in phases, I would like to address the program elements of Stage 1 in the implementation plan, in particular four program elements;

Water Use Efficiency
Water Quality
Watershed Management
Ecosystem Restoration

In our view these four programs deserve the highest priority during stage 1. These four programs are highly interrelated and must be addressed in concert. Comments are presented on each of these elements

Water Use Efficiency

The CALFED EIS/EIR estimates that the average indoor water use per capita by year 2020 is 55 gpcd. Based on the American Water Works Association Research Foundation (AWWARF) North American Residential End Use Water Study in 1996-1997, the indoor water use can be reduced below 55 gpcd and in a much shorter time period. San Diego was one of the twelve test sites chosen for this study. The average indoor water use in San Diego was 54.2 gpcd for 100 randomly selected homes. The average flow of the shower heads was 2.0 gpm. Of twelve test sites San Diego had the highest percentage of homes with equipped with ULFT's, 20.6%. California sites, Las Virgenes and Lompoc, followed with 18.6%. It should be noted that during this study very few homes in San Diego, if any, had the high efficiency horizontal axis clothes washers. Besides a ULFT rebate program, San Diego has an ordinance requiring retrofit to ULFT's upon resale of residential or commercial property. Voluntary compliance is used. The compliance rate for residential homes is 94% and for the commercial sector it is a low 28%. San Diego now has rebates for the front loading clothes washer.

The Water Use Efficiency Program Plan technical appendix , Section 5.4.2 shows that the South Coast estimated urban landscaped area increases from 480,000 acres in year 1995 to 650,000 acres in 2020, a 35% increase. Clearly major water savings can be achieved if high priority is placed on low water use xeriscape landscaping. Besides saving water xeriscape has numerous advantages over the conventional landscapes so prevalent in the

State today. These include lower maintenance- less pruning, less use of fertilizer and pesticides Less pruning means less green matter which would otherwise would need to be composted or sent to landfills. The State Integrated Waste Management Board encourages xeriscape for this reason. One of the major problems facing the State is to solve the urban run-off problem. Lower water usage is one of the means to accomplish this. Xeriscape using native plants is environmentally friendly in the sense that it helps to maintain the natural habitat for the native flora and fauna. On the other hand, conventional landscaping encourages exotic species, plants and animals. Fire ants is one alien species now invading California lawns and golf courses

CALFED should conduct public outreach, incentives and other means to foster xeriscaping. The average of the distribution for the ET_0 shown in the water efficiency program for the different regions of the State should be further shifted toward the lower ET_0 values.

CALFED should apply the California Irrigation Management Information System to the urban landscapers. Farmers using this system have reduced water needs and at the same time increased their crop yields. The general public as well as professional landscapers should be encouraged to use CMIS. The City of Santa Barbara has a web site explaining CIMIS. San Diego has plans to air CIMIS. data on local television stations as part of the daily weather forecast.

CALFED should address water conservation in the industrial sector. As an example, U.S. semiconductor manufacturers, with few exceptions, lag behind their Asian counterparts in recycling water. Typically Asian chip manufacturers recycle 60-80% of their process water.[1]

CALFED water conservation estimates for agriculture are too low. Because agriculture represents the largest water user in the state, significant water use reductions through innovative conservation measures will bring huge returns.

Water Quality

Improving water quality is critical not only for the Bay-Delta but also here in San Diego. San Diego receives the majority of its imported water from the Colorado River. It is blended with the water from the Bay-Delta to reduce the salt content. Consequently, the water quality in terms of it concentration in salts, organic matter, and bromides is important for health and recycling use. San Diego region is actively pursuing projects to recycle its wastewater. The viability of these recycling projects depends on having fresh water with acceptably low dissolved solids.

CALFED should place the highest priority on pollution prevention. Stopping pollution at the source is the most cost effective measure. Remediation once a pollutant enters the environment is costly and often ineffective. Public education to reduce the use of

[1] Technology 1999 Analysis & Forecast, The Environment, *Spectrum*, January 1999

pesticides, fertilizers, and other toxic pollutants is essential. CALFED should actively support hazardous household waste collection programs. Where applicable, public funds should be used to pay willing farmers to stop irrigating marginal lands that generate toxins in the water run-off.

Source control should include survey of all known dischargers and the constituents being discharged whether or not any constituent is on the current listed as a pollutant of concern. The objective is to screen for potential pollutants and keep them out of the environment. The CALFED plan for unknown toxicity is flawed in that in searches for the toxin after it shows up in the environment. It is well known that the number of potentially toxic chemicals will continue to grow as more chemicals are developed and used.

EPA in a letter to SWRCB dated 12 May 1999 listed dioxins, furans, and dioxin-like PCB's among the priority pollutants in the San Francisco Bay. CALFED should do likewise. The serious nature of dioxin contamination cannot be over-stressed. Persons are advised to limit eating the amount of fish caught from the San Francisco Bay. ("Agencies at Odds over Dioxin Risk in Bay", LA Times Aug. 23, 1999)

CALFED should add surfactants to the list of the pollutants of concern. Surfactants are used in many applications. They are used in conjunction with pesticides as adjuvants. Surfactants are also used in household and industrial detergents. Certain types of surfactants are known to be endocrine disruptors. Surfactants have been identified as one of the causes for the International Border Wastewater Treatment Plant in San Diego to consistently fail the acute toxicity test of its effluent.

CALFED should not construct the first leg of the peripheral canal diversion from the Sacramento River to the Mokelumne River. This short leg would cause great harm to the environment and would not bring appreciable improvements in water quality.

Watershed Management

CALFED should place much higher priority on this program element. The importance of watersheds in protecting water quality, conserving water, reducing floods, providing wildlife habitat are well known. Watershed management has been too long neglected throughout the state. The EPA listing of impaired bodies of water covers the entire length of the state. Closely related to watershed management is land use planning. Urban sprawl throughout the state is having major impacts on its watersheds. Watershed management should include all lands within a given watershed. Land use planning must play a major role to assure that the lands are used wisely and appropriately. CALFED for should actively participate by providing technical assistance to local entities to improve and manage their watersheds.

Operating as well as retired landfills should be strictly monitored and controlled to prevent leachates, surface runoff, erosion products, and airborne pollutants from entering the environment. New landfills in the future should be carefully sited taking due consideration of their environmental impacts on the watershed.

910(4)

Ecosystem Restoration

CALFED should set priorities on the ecosystem restoration projects. Water necessary to sustain a healthy ecosystem should be quantified. The San Francisco Bay is in a very high state of distress. CALFED should put more resources into restoring the Bay.

Sincerely,

Edward Kimura

Edward Kimura
Water Subcomittee